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7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 **PLAINTIFF'S NOTICE OF LODGING**
13 **EXHIBIT A UNDER SEAL REGARDING**
14 **PLAINTIFF'S RESPONSE TO**
DEFENDANTS' MOTIONS *IN LIMINE*
NO. 4

15 Pursuant to LRCiv 5.6(d), Plaintiff submits this Notice of Lodging Exhibit Under
16 Seal regarding Plaintiff's Response to Defendants' Motion *in Limine* No. 4.

17 Plaintiff provides notice that, pursuant to LRCiv 5.6(d), she has lodged with the
18 Court: BPV-17-01-00188522, Exhibit A to Plaintiff's Response to Defendants' Motion *in*
19 *Limine* No. 4 to Exclude Testimony and Evidence Regarding Photograph of Bard
20 Employee Michael Randall.

21 Defendants contend that Exhibit A is confidential and should be filed under seal.
22 As required under LRCiv 5.6(d), Plaintiff certifies that on February 2, 2017, the parties
23 met and conferred in good faith and were unable to agree about whether the documents
24 are confidential under the Protective Order and should be filed under seal. Plaintiff does
25 not believe that the disputed documents warrant continued confidential treatment as
26 proprietary or sensitive trade secret information.
27
28

1 RESPECTFULLY SUBMITTED this 1st day of February, 2018.

2 GALLAGHER & KENNEDY, P.A.

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor

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12 *Counsel for Plaintiffs*

13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on this 1st day of February 2018, I electronically transmitted
15 the attached document to the Clerk's Office using the CM/ECF System for filing and
16 transmittal of a Notice of Electronic Filing.

17 /s/ Gay Mennuti